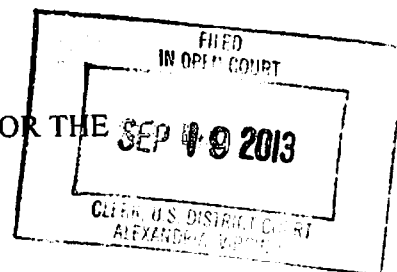


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

ERIC HARROUN,

Defendant.

)  
)  
) ~~CRIMINAL NO. 1:13cr272(CMH)~~  
) CRIMINAL NO. 1:13cr **369(CMH)**  
)  
)  
)

STATEMENT OF FACTS

Were this matter to go to trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. In or about and between 2000 and 2003, the defendant Eric Harroun was a member of the United States Army. During that time, the defendant acquired certain skills and received military training, including in the use of firearms and military tactics.

2. In or about and between May 2012 and January 2013, the defendant Eric Harroun traveled from the United States to Southeast Asia, Turkey and into Syria in order to join the Free Syrian Army and participate in military action against the Syrian government.

3. Prior to entering Syria, the defendant sought to obtain defense articles, including items listed on the United States Munitions List, to provide to rebel forces opposed to the Syrian government.

4. In or about January 2013, the defendant crossed the border from Turkey into Syria and joined a group of fighters affiliated with the Free Syrian Army. The defendant engaged in

military action with this group of fighters. While in Syria, the defendant also engaged in military action with a second group of fighters who were also fighting against the Syrian government. The defendant spent approximately one month in Syria fighting with forces opposed to the Syrian government. During that time, the defendant used the skills and training that he received in the U.S. military and shared some of those skills and training with others.

5. While in Syria, the defendant also agreed with others to seek to obtain defense articles, including items listed on the United States Munitions List, which would be transferred to fighters affiliated with the Free Syrian Army.

6. In or about February 2013, the defendant returned to Turkey, in part to purchase weapons and other supplies for fighters affiliated with the Free Syrian Army. Among other things, the defendant contacted others, including individuals at the United States Consulate in Turkey, in order to obtain defense articles listed on the United States Munitions List. Among other things, the defendant told agents from the Federal Bureau of Investigation that he had engaged in military action with rebel forces opposed to the Syrian government and that, based on conversation with other fighters, he had fought with Jabhat al-Nusrah, a designated terrorist organization.

7. The defendant has never registered with the Directorate of Defense Trade Controls as required pursuant to 22 CFR § 129.3 and did not apply for and did not obtain prior approval to engage in brokering activities as required pursuant to 22 CFR § 129.6.

8. At all times during the above-described incidents, the defendant's co-conspirators were aware that the defendant was not acting with the authorization or the approval of the United States government.

9. At all times during the above-described incidents, the defendant, ERIC HARROUN, acted unlawfully and knowingly and not because of mistake, accident, or other innocent reason.


Respectfully submitted,

Kathleen M. Kahoe  
Acting United States Attorney

By:   
Carter Burwell  
Assistant United States Attorney

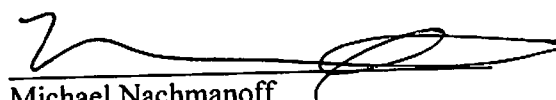
Defendant's Stipulation and Signature

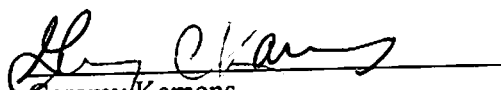
After consulting with my counsel, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
ERIC HARROUN  
Defendant

Defense Counsel's Signature

I am the attorney for ERIC HARROUN. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is informed and voluntary.

  
Michael Nachmanoff  
Federal Public Defender

  
Jeremy Kamens  
Assistant Federal Public Defender